IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LIQWD, INC. and OLAPLEX LLC,)
Plaintiffs,)
v.)) C. A. No
L'ORÉAL USA, INC., L'ORÉAL USA PRODUCTS, INC, L'ORÉAL USA S/D, INC., and REDKEN 5 TH AVENUE NYC,) DEMAND FOR JURY TRIAL))
L.L.C.,)
Defendants)

MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL

Plaintiffs, Liqwd, Inc. and Olaplex LLC (collectively "Plaintiffs") move for an order that their Complaint be filed under seal.

The reason for Plaintiffs' Motion is that the Complaint and Exhibit B to the Complaint contain confidential business information as well as information subject to a contractual obligation of confidentiality.

For these reasons, Plaintiffs respectfully request that the Court issue an Order that Plaintiffs' Complaint be filed under seal. Plaintiffs will file a redacted public version of the Complaint within 7 days pursuant to the Court's CM/ECF Procedures.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/Jack B. Blumenfeld

Jack B. Blumenfeld (#1014) Maryellen Noreika (#3208) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899 (302) 658-9200 jblumenfeld@mnat.com mnoreika@mnat.com

Attorneys for Plaintiffs

OF COUNSEL:

Amardeep (Amar) L. Thakur Joseph M. Paunovich QUINN EMANUEL URQUHART & SULLIVAN, LLP 865 S. Figueroa Street 10th Floor Los Angeles, CA 90017 (213) 443-3000

Matthew K. Blackburn DIAMOND McCarthy LLP 150 California Street Suite 220 San Francisco, CA 94111 (415) 263-9200

January 5, 2017

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LIQWD, INC. and OLAPLEX LLC,)
Plaintiffs,)
v.) C. A. No
L'ORÉAL USA, INC., L'ORÉAL USA PRODUCTS, INC, L'ORÉAL USA S/D, INC., and REDKEN 5 TH AVENUE NYC, L.L.C.,) DEMAND FOR JURY TRIAL))
Defendants.)

ORDER

This __ day of January, 2017, Plaintiffs Liqwd, Inc. and Olaplex LLC, having moved for leave to file the Complaint in this action under seal, and the Court having determined that good grounds exist for the requested relief; now, therefore,

IT IS HEREBY ORDERED that Plaintiffs' Motion for Leave to File Complaint Under Seal is GRANTED.

United States District Judge